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IN THE

Supreme Court of the United States

OCTOBER TERM, 1960

No. 776

THE CALIFORNIA COMPANY, *Petitioner*,

v.

THE UNITED GAS IMPROVEMENT COMPANY

and

PUBLIC SERVICE COMMISSION OF THE STATE OF NEW YORK, *Respondents*.

PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

MILTON RICHTER
826 Pennsylvania Building
Washington 4, D. C.

LUCIUS M. LAMAR
WOODLEN H. WALSHE
800 The California Company Building
New Orleans 12, Louisiana
Of Counsel

JUSTIN R. WOLF
CHARLES A. CASE, JR.
1625 K Street, N. W.
Washington 6, D. C.
Attorneys for Petitioner, The California Company

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The California Company prays that a writ of certiorari issue to review the judgment of the United States Court of Appeals for the Ninth Circuit entered in the above cause on October 31, 1960.

OPINIONS BELOW

The opinion of the Court of Appeals (App. A, *infra*, pp. 1a-16a) is reported at 283 F. (2d) 817. The order

of the Federal Power Commission granting certificates (R. 147-153) is reported at 22 FPC 252; its order denying rehearing (R. 179-181) is reported at 22 FPC 653.[1]

JURISDICTION

The judgment of the Court of Appeals was entered on October 31, 1960 (App. A, *infra*, p. 16a). Petitions for rehearing, timely filed, were denied on December 7, 1960 (App. A, *infra*, p. 17a). The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1) and Section 19(b) of the Natural Gas Act, 15 U.S.C. 717r(b).

QUESTIONS PRESENTED

Following the recent decision of this Court in *Atlantic Refining Co.* v. *Public Service Commission of the State of New York*, 360 U.S. 378 (*Cities*), the Federal Power Commission determined upon a price line which governed its issuance of unconditioned certificates of public convenience and necessity under Section 7(e) of the Natural Gas Act to producers of natural gas in south Louisiana. The issues in this case concern the manner in which the Commission established that line and the level of the line. Specifically, the questions presented are:

1. Whether, in determining the line, the Commission is precluded from considering the prices in currently certificated sales which are final and not subject to court or Commission review because such prices are higher than the alleged pre-*Cities* level and some like prices in other sales are subject to further judicial or administrative scrutiny.

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[1] All record references are to the Joint Appendix.

2. Whether, in view of benefits accruing from the instant sale, the Commission abused its discretion in failing properly to consider the insubstantially higher tax reimbursement provided in the contract.

3. Whether, in view of the Commission's experience with and intimate knowledge of the sales made in the south Louisiana gas producing area, the Commission erred in failing to make specific findings as to the details of the sales being compared.

STATUTE INVOLVED

The pertinent provisions of the Natural Gas Act, 52 Stat. 821-833 (1938), as amended, 15 U.S.C. 717-717w, are set out in Appendix B, *infra*, pp. 18a-19a.

STATEMENT

This case concerns the validity of an order of the Federal Power Commission issued under Section 7(c) of the Natural Gas Act (App. B, *infra*, p. 19a) granting certificates of public convenience and necessity to The California Company (California) and The Superior Oil Company (Superior) authorizing them to sell gas produced from certain fields in south Louisiana to United Gas Pipe Line Company (United) for resale in interstate commerce.

By application filed August 22, 1958 (R. 81-85), California sought authorization to sell its gas produced from the Bayou Penchant field, Terrebonne Parish, Louisiana, to United pursuant to the provisions of a gas sales contract dated July 21, 1958 (R. 39-80). Superior requested similar authorization to sell gas to United pursuant to its gas sales contract which covered gas produced by Superior from the Bayou Penchant, Palmetto Bayou and Four Isle Dome fields

in Terrebonne Parish (R. 87-125).[2] Both contracts provided for an initial base price of 21.5 cents per Mcf, plus reimbursement in full up to an amount of 2.3 cents per Mcf, for certain taxes imposed by the state of Louisiana upon the production, severance or gathering of natural gas (R. 56, 59-60, 111, 114-115).

The only issue at the hearing, in which The United Gas Improvement Company (UGI), and the Public Service Commission of the State of New York (New York Commission),[3] as well as the applicants and Commission staff counsel participated, was whether the sales to United at the initial price proposed, were required by public convenience and necessity. On this issue, the record[4] shows that between 30 and 50 certificates had been issued for sales in south Louisiana under contracts providing for the same initial base price (R. 14). The record also shows that none of United's gas purchase contracts contain any favored

[2] Since United had already been certificated in another proceeding to construct and operate facilities to enable it to receive gas produced in the Bayou Penchant and Palmetto Bayou fields, United's related application requested authority to construct and operate at a cost of $1,120,312.00 approximately 10 miles of 16-inch gathering line for the purpose of receiving Superior's gas in the Four Isle Dome field (R. 127-129).

[3] Neither UGI nor the New York Commission purchase gas directly from United. United sells gas to 2,000 customers (R. 25); none of these customers intervened in the proceeding or otherwise protested United's acquisition of the gas involved herein at the contract price.

[4] Testimony and evidence was presented only by the applicants. While UGI, the New York Commission and staff counsel cross-examined the witnesses presented by the applicants, they did not present any testimony or evidence in opposition or rebuttal and the facts of record are not disputed.

nation clauses (R. 15) and that the purchase of gas under the contracts here involved will result in an increase of only 2.7 mills per Mcf in United's average unit cost of purchased gas (R. 18).

The record further shows that United's existing customers have called upon United for steadily increasing volumes of gas since 1948 and will continue to do so, that by the end of 1957 United's annual sales to its customers had reached a level of 1.25 trillion cubic feet and that United currently needs to acquire each year additional reserves in the magnitude of 1.25 trillion cubic feet in order to maintain adequate service to its existing customers (R. 7-11).

Finally, the evidence shows that the contracts were negotiated at arms length (R. 4-6, 29), that the gas reserves involved are estimated to be approximately 636 billion cubic feet (R. 7) and will provide United with approximately 30 billion cubic feet of gas annually (R. 17), that the reserves are located in close proximity to United's existing pipeline system (R. 4), and that other purchasers were attempting to buy the gas (R. 22-23, 30).

By decision issued April 16, 1959, the Examiner recommended the granting of each of the authorizations requested by the applicants (R. 135-144). UGI excepted to the proposed grant of certificates without price condition. In addition, UGI requested the Commission to defer issuance of permanent certificates until after decisions had been rendered by this Court in the then pending proceeding in *Cateo* and by the Court of Appeals for the Third Circuit in a proceeding then pending in *United Gas Improvement Co.* v. *Federal Power Commission*, 269 F. (2d) 865 (*Transco-Seaboard*) (R. 146-147).

The Commission acceded to this request. *Catco* was decided June 22, 1959, and *Transco-Seaboard* on August 4, 1959. Thereafter, on August 10, 1959, the Commission issued its order granting unconditioned certificates to California and Superior (R. 147-153).

In its order the Commission found, *inter alia*, that the instant proposed initial prices were not out of line within the standard set out in *Catco*, that none of the prices in United's other contracts would be triggered by the price for the instant sales, and that while the combined effect of the initial prices would be to increase United's overall cost of gas by 2.7 mills per Mcf, that effect did not require, considering the several benefits accruing to United from the acquisition of these reserves, either denial of the sale nor the attachment of a price condition.

Upon review the Court below approved the Commission's use of current initial prices for comparative purposes in determining whether the initial prices in the instant sales meet the requirements of public convenience and necessity under Section 7(e) of the Act (App. A, *infra*, pp. 8a-10a). In addition, the Court rejected the contentions that the initial price proposed in a certificate proceeding must be found to be just and reasonable within the purview of Sections 4 and 5 of the Act and that the "line" at which prices were to be held must accord with an alleged pre-*Catco* level.

The Court, however, held that prices which were under court or commission review and, indeed, like certificated prices in the same area which were not subject to further judicial or administrative review were "under a cloud" or "suspect" and that the Commission abused its discretion in determining a price line based upon such prices. The Court also held that

comparative tax reimbursement provisions, as well as comparative base rates, ought to be taken into consideration in determining whether a proposed initial price is out of line, and that failure to take account of substantial differences in tax reimbursement also constituted an abuse of discretion. Accordingly, the Court vacated the Commission's order and remanded the case to the Commission for further proceedings.

REASONS FOR GRANTING THE WRIT

The order in this case, together with five other orders[3] issued by the Federal Power Commission on August 7 and 10, 1959, represent the first application by the Commission of the principles enunciated by this Court in *Catco* and were intended by the Commission to reflect its resolution of the initial price problem in the south Louisiana gas supply area in accordance with that decision.

In vacating the Commission's authorization of the sale involved in this case at the initial base price proposed, the Court below erred in holding that in determining the price level by which to measure the propriety of a proposed initial price as contemplated

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[3] *South Georgia Natural Gas Company, et al.*, 22 FPC 211; *Sun Oil Company*, 22 FPC 351, and *The Superior Oil Co.*, 22 FPC 369, vacated and remanded in *United Gas Improvement Co. v. Federal Power Commission*, —— F. (2d) ——, CA 5, opinion rendered February 22, 1961; *Sunray Mid-Continent Oil Co.*, 22 FPC 361, vacated and remanded in *The United Gas Improvement Company v. Federal Power Commission*, —— F. (2d) ——, CA 10, opinion rendered January 23, 1961; *Texas Gas Transmission Corp., et al.*, 22 FPC 378, reversed and remanded *Public Service Commission of the State of New York v. Federal Power Commission*, —— F. (2d) —— (C.A.D.C.), opinion rendered December 8, 1960. We understand that a petition for a writ of certiorari has already been filed in the latter case.

by *Catco*, the Commission may not rely on either certificated prices currently under review *or* like permanently certificated prices even though not under review. Not only does this ruling unduly confine the Commission's power of scrutiny, contrary to this Court's teachings in various decisions, including *Catco*, and the plain language of Section 7(e) of the Natural Gas Act, but by excluding from Commission consideration virtually all sales at currently prevailing prices, it in effect requires a rollback of prices to some alleged pre-*Catco* line, a line which the Court below itself recognizes has "no current relevancy" (App. A, *infra*, p. 10a).

In addition to being internally inconsistent, the decision below forebodes serious practical consequences for regulation of natural gas companies, both generally under the Natural Gas Act and particularly with regard to sales of gas from the prolific south Louisiana producing area which has been the focal point of recurrent initial price controversies before the Commission. If the decision below is not reversed, the Commission's ability effectively to deal with the problem will be seriously impaired, with the consequence that further development of gas reserves may be discouraged and needed expansions of service materially delayed. Since definitive clarification of the scope of the Commission's authority under *Catco* is thus urgently needed, review by this Court is plainly warranted.

1. The Court below erred in holding that final, certificated prevailing prices would not properly be relied upon by the Commission in fixing a comparative price line because other prices certificated at the same level were subject to some further administrative or judicial review.

Of the 47 certificates which the Court mentioned as being those upon which the Commission may have relied in establishing an initial price line at 21.5 cents per Mcf base price for gas sold in south Louisiana (see also R. 14-15, *supra*, p. 4), the Court below recognized that at least twelve were final and not subject to any further review. [6] In addition, four more certificates had become final while this case was *sub judice* in the Court below.[6] Regardless of the disposition made by the courts, or the Commission upon remand, of the remaining 31 certificated sales at the same base price, it would have no effect upon the initial prices authorized under the 16 certificated sales which are now final. The certificate holders are and will remain lawfully entitled to receive a base price of not less than 21.5 cents per Mcf plus tax reimbursement without obligation to refund. In these circumstances, these 16 certificated sales stand independently of all other sales and are in no way suspect or subject to any infirmity. Hence these sales in themselves plainly provide a proper frame of reference from which a price line having current relevance can be determined.

As the Court below recognized, *Catco* does not preclude utilization of such currently prevailing prices to establish a price line. *Catco* does not require the Commission to roll back prices to any pre-*Catco* line; indeed this Court in *Catco* did not hold that the prices

[6] These additional four certificates were issued at a 22 cent per Mcf base price in the so-called *Trunkline Gas Company* case (App. A, *infra*, pp. 10a-11a). These certificates had become final by virtue of the dismissal of the petition for review in a decision rendered April 28, 1960 in *Public Service Commission of the State of New York* v. *Federal Power Commission*, 284 F. (2d) 200 (C.A.D.C.). Rehearing was denied on June 1, 1960 and no petition for a writ of certiorari was filed with this Court.

there involved were invalid *per se*. Instead, without itself fixing a line, this Court directed the Commission, in this formative stage of producer regulation, to hold a price line. Having regard for the fundamental relationship which exists between administrative tribunals and the courts, the responsibility for determining upon the line to be held must and does rest solely with the Commission. *Securities and Exchange Commission* v. *Chenery Corp.*, 318 U.S. 80, 95; *Interstate Commerce Commission* v. *Parker*, 326 U.S. 60, 65-66.

In determining the line at which to hold prices, as in all certificate matters, the scope of Commission inquiry is and must be broad. Section 7(e) of the Natural Gas Act states that the Commission must find, before issuing a certificate, that the proposed sale of gas "is or will be required by the present or future public convenience and necessity". This Court has described the administrative function in granting certificates under that standard as:

> "* * * not only to appraise the facts and to draw inferences from them but also to bring to bear upon the problem an expert judgment and determine from its analysis of the total situation on which side of the controversy the public interest lies * * *. (*United States* v. *Detroit & Cleveland Navigation Co.*, 326 U.S. 236, 241)."

Although the Court below recognizes the propriety of the Commission's use of current prices for comparative purposes in establishing a price line, its actual ruling narrowly confines the Commission's power of scrutiny only to a level of certificated prices which has never been challenged in the courts. Thus the ruling of the Court below has the anomalous effect

of frustrating any attempt by the Commission to accomplish the very objective which the Court said should be the Commission's objective under *Catco*—namely, to establish and hold a price line which has current relevancy.

The narrow ruling of the Court below overlooks the broad standard of Section 7(e) and, in effect, compels the Commission to let prices negotiated in the distant past be the sole measure of the public interest and excludes those factors relating to the present and future public convenience and necessity. Such a result is inconsistent with the ruling in *Detroit Navigation* where this Court stressed that in certificate cases:

> "* * * Forecasts as to the future are necessary to the decision. * * * It may be that the public interest requires that future * * * needs be assured rather than left uncertain. The Commission has the discretion so to decide." (326 U.S. 236, 241).

The Commission should be able to consider price in terms of the total situation. The necessity for stimulating the discovery and development of greater supplies for the future needs of the public may be equally, if not more, important than the present cost of gas to the consumer.[7] The responsibility of the Commission in this regard was emphasized by this Court's

[7] The Commission in its order stated (R. 152):

> "Furthermore, United needs this gas to help meet the present and future demands of its customers and the markets it serves. The facts disclose that United delivers to its customers in excess of 1 trillion cubic feet of gas each year, that the demands on United's system increase each year, and that United must continue its policy of buying gas reserves in order to continue to supply the service it has undertaken to provide."

statement in *Atlco* that Section 7(c) "requires the Commission to evaluate *all* factors bearing on the public interest". (360 U.S. at 391) [Emphasis added]

2. The prices in the 16 cases referred to *supra* are not made suspect because they are at the same level as the 31 prices certificated by the Commission in the *Transco-Seaboard* proceedings which were the subject of this Court's remand at *Public Service Commission of the State of New York, et al.* v. *Federal Power Commission*, 361 U.S. 195, 197. That remand by its very terms did not invalidate the level of prices certificated in that case, much less the level established by certificates issued in other and independent proceedings which are now final.

In *Transco-Seaboard* this Court vacated the judgment of the Third Circuit and directed that Court to remand the proceedings to the Commission for reconsideration and redetermination in the light of *Atlco*. In other cases where this Court has similarly vacated a judgment and remanded a case for reconsideration or redetermination in the light of a particular decision, such action has not been construed by either this Court or the lower tribunal to which the case was remanded as requiring it to reach a different result. *Barenblatt* v. *United States*, 354 U.S. 930; *Barenblatt* v. *United States*, 252 F. (2d) 129 (C.A.D.C.), affirmed 360 U.S. 109; *Uphaus* v. *Wyman*, 355 U.S. 16; *Wyman* v. *Uphaus*, 101 N.H. 139, 136 A. (2d) 221, affirmed *sub nom. Uphaus* v. *Wyman*, 360 U.S. 72; *Joines* v. *United States*, 357 U.S. 573; *United States* v. *Joines*, 258 F. (2d) 471 (C.A. 3), *cert. den., sub nom. Joines* v. *United States*, 358 U.S. 880).

In each of these series of cases, the lower tribunals, on remand, adhered to their initial decisions. Thereafter this Court denied certiorari in the *Joines* case and in the others it granted certiorari and affirmed the judgments of the lower courts.

In view of these cases, it is clear that the remand in *Transco-Seaboard* does not compel the Commission to reach a different result in that case upon reconsideration. The prices certificated in these 31 cases therefore cannot properly be held to be suspect in themselves or to cast a cloud upon other like prices.

Moreover, even if the prices in the 31 certificates involved in *Transco-Seaboard* were currently under court review, that fact would not invalidate for comparative price purposes the 16 final certificated prices. Every Commission order is presumed to be valid until judicially determined otherwise. The mere filing of a petition for review does not create a presumption of invalidity.

3. The Court below also erred in ruling that the Commission failed properly to consider the effect of the tax reimbursement provisions of the contracts upon the total price.

While the Commission looked primarily to the initial base prices in determining that the proposed price was not "out of line", the Commission's order on its face shows that it recognized the effect of tax reimbursement. Not only did the Commission actually compare the instant tax reimbursement provisions with those contained in other gas sales contracts submitted in earlier certificate proceedings, but specifically held that

in the circumstances the higher tax reimbursement was justified (R. 150-151):

> "Although the price proposed by The California Company and Superior in this case involves greater tax reimbursement than some other 21.5-cent sales, in our opinion this greater tax reimbursement is justified by the factors present, including the size of these reserves, their accessibility to United's pipeline, and the need of United to offer some additional price incentive in order to secure the volumes of gas in question."

Moreover, the allowance of the tax reimbursement here involved was not error under the Court's own ruling that insubstantial differences in tax reimbursement are not to be controlling. The record before the Commission shows the instant contract provided for a tax reimbursement in an amount which exceeded that in a previously certificated sale to another pipeline purchaser not subject to judicial review by only 1/8th of a cent per Mcf (R. 31). On its face this slight difference is insubstantial.

4. Finally the Court erred in holding that valid comparisons between the instant prices and other like prices could be had only when the Commission makes findings respecting the details of the various gas sales contracts being compared.

As noted *supra*, the Commission's findings in this case that the instant price was not out of line on a comparative basis (R. 150), and that a number of 21.5 cent contracts have been executed in south Louisiana (R. 150), were made in the context of its issuance in August 1959 of five other orders dealing with sales of

gas produced in south Louisiana. The Commission's knowledge of the details governing sales in this well-known area is replete. Both *Cities* and *Transco-Seaboard*, as well as at least 16 other cases, involved sales from this area.

The Commission's records accumulated in major part from this large number of previous certificate proceedings are voluminous and provide it with a detailed knowledge respecting such factors as price, reserves, contract delivery obligations, quality specifications, terms of measurement, tax reimbursement provisions and other factors. Indeed, without such knowledge the Commission could not find; as it did, the benefit of the instant sales to United in terms of reserves acquired, proximity to United's existing pipeline facilities and delivery volumes (R. 151-152).

It is well established that a court may take judicial notice of the records in other cases in that court. *United States* v. *Pink*, 315 U.S. 203, 216 and cases cited therein. The ruling of the Court below which in effect directs the Commission to spread upon the record the facts already amassed in the records supporting other certificated sales would delay the expeditious conduct of urgent Commission business and is wholly unnecessary to enable the Commission properly to form a judgment whether a proposed sale is comparable to other certificated sales at the same price.

CONCLUSION

For the foregoing reasons, it is respectfully submitted that this petition for a writ of certiorari should be granted.

JUSTIN R. WOLF
CHARLES A. CASE, JR.
1625 K Street, N. W.
Washington 6, D. C.
Attorneys for Petitioner,
The California Company

MELVIN RICHTER
826 Pennsylvania Building
Washington 4, D. C.

LUCIUS M. LAMAR
WOOLLEN H. WALSHE
800 The California Company Building
New Orleans 12, Louisiana

Of Counsel

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